

Document Electronically Filed

David R. King
dking@herrick.com
Leah Kelman
lkelman@herrick.com
HERRICK FEINSTEIN LLP
One Gateway Center
Newark, New Jersey 07102
(973) 274-2000

Richard S. Mandel (to be admitted *pro hac vice*)
Jonathan Z. King (to be admitted *pro hac vice*)
COWAN, LIEBOWITZ & LATMAN, P.C.
114 West 47th Street
New York, NY 10036
(212) 790-9200

Attorneys for Plaintiffs
Promotion In Motion, Inc. and Welch Foods Inc., A Cooperative

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PROMOTION IN MOTION COMPANIES, INC.,
and WELCH FOODS, INC., A COOPERATIVE

Plaintiffs,

v.

KERVAN USA LLC,

Defendant.

20-CV-

**CERTIFICATION OF NON-
ARBITRABILITY PURSUANT TO
LOCAL CIVIL RULE 201.1**

Plaintiff, through its undersigned counsel, hereby certify that the alleged damages recoverable in this action exceed \$150,000, exclusive of interest and costs.

Dated: December 24, 2020

HERRICK, FEINSTEIN LLP

By: /s/ David R. King
David R. King
One Gateway Center
Newark, New Jersey 07102
Tel: (973) 274-2002
Fax: (973) 274-6404
dking@herrick.com

Of Counsel:

Richard S. Mandel, Esq.
Jonathan Z. King, Esq.
COWAN, LIEBOWITZ & LATMAN, P.C.
1133 Avenue of the Americas
New York, NY 10036
(212) 790-9200
Pro Hac Vice Applications to be filed

*Attorneys for Plaintiffs Promotion In
Motions, Inc. and Welch Foods, Inc., A
Cooperative*